

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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October 5, 2021

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
 Remedial Project Manager  
 Institutional Controls Coordinator  
 U.S. Environmental Protection Agency Region 5  
 77 West Jackson Boulevard (SR-6J)  
 Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 63 (July-September 2021)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from July-September 2021.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the July-September 2021 period, the Group continued to perform title searches for use with 10 draft environmental covenants, including the draft environmental covenants for the 1555 State Street property; the Unknown Road (Taracorp) property; the [REDACTED] Non-responsive [REDACTED]; the Taracorp pile property; the Mayco (Illinois), LLC property; the Terminal Railroad Association property; the U.S. Carriers Inc. property; the Transload Realty property; and the [REDACTED] Non-responsive [REDACTED] property. The Group's project coordinator received approval from EPA and Illinois EPA during a conference call on September 21, 2021 to initiate efforts with the property owners after the title searches have been completed and the lists of encumbrances have been prepared.
- **Remote Fill Properties:** The Group's project coordinator sent a letter to EPA on May 26, 2021 to provide the Group's draft Scope of Work for Soil Sampling on Remote Fill Properties. The Group's project coordinator discussed the draft Scope of Work for Soil Sampling on Remote Fill Properties with EPA and Illinois EPA representatives on August 10, 2021 and September 21, 2021.
- **Operation and Maintenance:** During the July-September 2021 period, the Group's project coordinator continued to prepare a revised Operation and Maintenance Plan to update the Group's 2002 Operation and Maintenance Plan. In addition, the following operation and maintenance activities were performed at the site:

July 2	The Group's lawn maintenance contractor, Munie Greencare Professionals ("Munie"), cut the vegetation along the State Steet sidewalk and fence.
July 15	Munie cut the vegetation along the State Steet sidewalk and fence.
July 22	The Group's project coordinator sent an email to Munie's project manager regarding Munie's schedule for checking the vegetation on the flat parts of the 1555 State Street and Taracorp pile properties.
July 29	The Group's project coordinator spoke to the Granite City Sanitation Department's representative regarding Munie's plans and schedule for cutting the vegetation at the site.
July 30	Munie cut the vegetation along the State Steet sidewalk and fence.
August 2	The Group's project coordinator sent an email to the Granite City Sanitation Department's representative to confirm that Munie planned to cut the vegetation on the 1555 State Street property and Taracorp pile cap on August 5, 2021.
August 5	Munie cut the vegetation on the 1555 State Street property and Taracorp pile cap at the main industrial site.
August 11	Munie cut the vegetation along the State Street sidewalk and fence.
August 26	Munie cut the vegetation along the State Street sidewalk and fence.
September 30	Munie cut the vegetation on the 1555 State Street property and Taracorp pile cap at the main industrial site.

- **Project Coordination:** During the July-September 2021 period and in addition to items previously noted, the Group's project coordinator performed the following work related to the site:

July 1	Submitted Quarterly Progress Report 62 to EPA.
July 21	Sent an email to EPA's project manager to request an update in regard to the Group's Petition for Partial Deletion and received a response from EPA's project manager.
July 21	Sent an email to respond to EPA's project manager inquiry regarding availability for a project status call.
August 6	Spoke to the City of Venice's attorney in regard to the draft roadways ordinance for Venice.
August 10	Participated in a conference call with EPA and Illinois EPA regarding the status of work at the site.
August 11	Sent an email to EPA's project manager to provide updated contact information for the City of Venice's attorney
August 12	Sent an email to EPA's project manager to confirm that efforts had been initiated to research the background lead concentrations in soil at

	the site, to research the lead concentrations in soil backfill used for remedial activities, and to respond to EPA's requests for information.
August 17	Sent an email and memorandum to EPA to respond to EPA's inquiry and provide excerpts from historical reports summarizing the lead concentrations in soil backfill used for restoration of remediated properties.
August 17	Sent an email and memorandum to EPA to respond to EPA's inquiry and provide information related to the background lead concentrations in soil at the site.
September 7	Sent an email to EPA to provide an acknowledgement that EPA's August 25, 2021 bill had been paid.
September 21	Participated in a conference call with EPA and Illinois EPA regarding the status of work at the site.
September 27	Sent an email to EPA to respond to questions from EPA's project manager about the Master List for Stack Emissions Properties and the Group's February 2017 list summarizing access efforts, soil sampling, and remedial activities performed from 2010-2016.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- Not applicable for this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will schedule and perform an annual site visit with EPA and/or Illinois EPA.
- The Group will continue to perform operation and maintenance activities at the site, as required. As part of those activities, the Group will perform an operation and maintenance inspection and will continue to prepare an updated operation and maintenance plan.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will address comments or questions, if any are received from EPA, on the draft Scope of Work for Soil Sampling on Remote Fill Properties.

- The Group will continue to perform title searches, as part of efforts to finalize environmental covenants. Upon completion of title searches, the Group will prepare lists of encumbrances for inclusion in the environmental covenants and initiate efforts with property owners.
- The Group will address comments and questions, if any are received from EPA, on the Petition for Partial Deletion from the National Priorities List, which was submitted to EPA in March 2021.
- The Group will address comments, if any are received, on the draft administrative records, draft notices of soil contamination, and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019 and October 2020.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties [REDACTED] in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties [REDACTED] Non-responsive in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

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**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**MONTROSE**

A handwritten signature in black ink, appearing to read "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent.

Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath – Illinois EPA (by electronic mail and first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)